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REDACTED – FOR PUBLIC INSPECTION

July 1, 2015

VIA HAND DELIVERY AND ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *WC Docket No. 14-58*
PTI Pacifica Inc. dba IT&E Form 481 Submission, SAC 659002
Request for Confidential Treatment

Dear Ms. Dortch:

On behalf of PTI Pacifica Inc. dba IT&E (“IT&E”), pursuant to Sections 54.313(i) and 54.422(c) of the Commission’s Rules,¹ please find (1) IT&E’s Form 481 submission for SAC 659002 (Commonwealth of the Northern Mariana Islands or “CNMI”), which was timely filed with USAC, and (2) a request that this material be withheld from public inspection pursuant to sections 0.457 and 0.459 of the Commission’s Rules.²

The submission contains commercial and technical data that IT&E does not in the normal course of its business reveal to the public or its competitors. IT&E thus requests that the submission be withheld from public inspection under Freedom of Information Act (“FOIA”) Exemption 4, 5 U.S.C. §552(b)(4), and Section 0.457(d)(2) of the Commission’s Rules.

¹ 47 C.F.R. §§ 54.313, 54.422.

² 47 C.F.R. §§ 0.457, 0.459.

REDACTED – FOR PUBLIC INSPECTION

In support of this request, IT&E provides the following information, as required by Sections 0.457(d)(2) and 0.459(b) of the Commission's Rules.

1. Information for Which Confidentiality is Requested. IT&E is requesting confidential treatment for the non-redacted portions of the Form 481 submission, which contain commercially-sensitive, proprietary, and confidential operational, cost and technical information about IT&E's past and anticipated investments in the very competitive wireless market in CNMI.
2. Circumstances Giving Rise to Submission of Materials. IT&E is submitting Form 481 and attachments to comply with newly adopted FCC rules.
3. Degree to Which Information is Commercial or Financial, or Contains a Trade Secret or is Privileged. The attached document contains commercially-sensitive, proprietary, and confidential operational, financial and technical information about IT&E's wireless infrastructure and plans in CNMI. IT&E closely guards this information against disclosure to competitors and the public. The information for which confidential treatment is sought concerns IT&E's private business and operations and "would customarily be guarded from competitors." See 47 C.F.R. §§ 0.459(a)(4), 0.457(d)(2). Such proprietary and confidential information may be withheld from public disclosure under FOIA Exemption 4.
4. Degree to Which Information Concerns a Service That is Subject to Competition. The submission contains commercially-sensitive, proprietary, and confidential operational and financial information about IT&E's past investments and future infrastructure plans in the CNMI CMRS market, which is highly competitive.
5. Substantial Competitive Harm That Would Result from Disclosure of Information. Public disclosure of the commercially-sensitive, proprietary, and confidential operational and financial information set forth in the Plan would cause competitive harm to IT&E. The wireless industry in CNMI is highly competitive, and thus others always are interested in gaining a competitive advantage by learning information about IT&E's infrastructure plans and construction schedules. The D.C. Circuit has found that parties do not have to "show actual competitive harm" to justify confidential treatment. Rather, "[a]ctual competition and the likelihood of substantial competitive injury" is sufficient to bring commercial information within the realm of confidentiality." *Public Citizen Health Research Group*, 704 F.2d at 1291, quoting *Gulf & Western Industries v. U.S.*, 615 F.2d 527, 530 (D.C. Cir. 1979).
6. Measures Taken to Prevent Unauthorized Disclosure. IT&E treats the operational and financial information set forth in the submission as confidential and proprietary and does not publicly disclose this information.
7. Previous Disclosure. There has been no public disclosure of the information that IT&E has redacted in its public filing.

REDACTED – FOR PUBLIC INSPECTION

8. Requested Duration of Nondisclosure. The attached Request should not be released for public inspection until such information no longer is deemed confidential and proprietary by IT&E and no longer subject to IT&E's internal procedures for maintaining its confidentiality. The attached Request contains commercially-sensitive, proprietary and confidential operational and technical information, the release of which would adversely affect IT&E's competitive position.

For the foregoing reasons, IT&E respectfully requests that the Commission withhold from public inspection the attached document. Consistent with 47 C.F.R. § 0.459(d)(1), IT&E requests notification if access to the attachment is requested pursuant to the FOIA or otherwise, so that IT&E may have an opportunity to oppose the grant of any such request. As noted previously, a redacted version of the document is being filed with ECFS.

If you have any questions, please contact the undersigned.

Respectfully submitted,

/s/ Timothy J. Cooney
Timothy J. Cooney

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

REDACTED - FOR PUBLIC INSPECTION
FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	659002
<015> Study Area Name	PTI PACIFICA, INC.
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	Dr. Frederick R. Hill
<035> Contact Telephone Number: Number of the person identified in data line <030>	6706824556 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	fred.hill@itechq.net

ANNUAL REPORTING FOR ALL CARRIERS	54.313 Completion Required	54.422 Completion Required
-----------------------------------	----------------------------------	----------------------------------

<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input type="checkbox"/>	<input type="checkbox"/>
<310> Detail on Attempts (voice)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)		<input type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input type="checkbox"/>	<input type="checkbox"/>
<410> Fixed	1.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	1.0	<input type="checkbox"/>	<input type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input type="checkbox"/>	<input type="checkbox"/>
<440> Fixed		<input type="checkbox"/>	<input type="checkbox"/>
<450> Mobile		<input type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 659002MP510.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 659002MP610.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	Not Applicable	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010>	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<1100>	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

<2000> Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

(100) Service Quality Improvement Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	659002
<015>	Study Area Name	PTI PACIFICA, INC.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Dr. Frederick R. Hill
<035>	Contact Telephone Number - Number of person identified in data line <030>	6706824556 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	fred.hill@itehq.net
<110>	Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	<input type="radio"/> (yes / no) <input checked="" type="radio"/> <input type="radio"/> (yes / no) <input type="radio"/>
<111>		

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

659002 2015 Quality Service Improvement Plan.pdf

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

<113>	Maps detailing progress towards meeting plan targets	Yes
<114>	Report how much universal service (USF) support was received	Yes
<115>		Yes
<116>		Yes
<117>		Yes
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	Yes

(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

[illegible]

[illegible]

**(800) Operating Companies
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	659002
<015>	Study Area Name	PTI PACIFICA INC.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Dr. Frederick R. Hill
<035>	Contact Telephone Number - Number of person identified in data line <030>	6706824556 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	fred.hill@itehq.net
<810>	Reporting Carrier	PTI Pacifica, Inc.
<811>	Holding Company	PTI Pacifica Inc.
<812>	Operating Company	PTI Pacifica, Inc.

[illegible]

(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	659002
<015>	Study Area Name	PTI PACIFICA, INC.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Dr. Frederick R. Hill
<035>	Contact Telephone Number - Number of person identified in data line <030>	6706824556 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	fred.hill@itehq.net

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

- <921>
- <922> Feasibility and sustainability planning;
<923> Marketing services in a culturally sensitive manner;
<924> Compliance with Rights of way processes
<925> Compliance with Land Use permitting requirements
<926> Compliance with Facilities Siting rules
<927> Compliance with Environmental Review processes
<928> Compliance with Cultural Preservation review processes
<929> Compliance with Tribal Business and Licensing requirements.

(1100) No Terrestrial Backhaul Reporting		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	659002
<015>	Study Area Name	PTI PACIFICA, INC.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Dr. Frederick R. Hill
<035>	Contact Telephone Number - Number of person identified in data line <030>	6706824556 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	fred.hill@itehq.net

<1130>

(1200) Terms and Condition for Lifeline Customers		FCC Form 481	
Lifeline		OMB Control No. 3060-0986/OMB Control No. 3060-0819	
Data Collection Form		July 2013	

<010>	Study Area Code	659002	
<015>	Study Area Name	PTI PACIFICA, INC.	
<020>	Program Year	2016	
<030>	Contact Name - Person USAC should contact regarding this data	Dr. Frederick R. Hill	
<035>	Contact Telephone Number - Number of person identified in data line <030>	6706824556 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	fred.hill@itehq.net	

Wireless Lifeline Policy.docx

<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	
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<1220>	Link to Public Website	HTTP	ww2.ite.net
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<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	
<015>	Study Area Name	855002
<020>	Program Year	PVI PACIFICA, INC.
<030>	Contact Name - Person USAC should contact regarding this data	2016
<035>	Contact Telephone Number - Number of person identified in data line <030>	Dr. Frederick K. Hill
<039>	Contact Email Address - Email Address of person identified in data line <030>	8706624556 ext. fred.hill@teng.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

- Incremental Connect America Phase I reporting
- <2010> 2nd Year Certification [47 CFR § 54.313(b)(1)i]
 - <2011a> 3rd Year Certification [47 CFR § 54.313(b)(1)iii]

Price Cap Carrier Receiving Frozen Support Certification [47 CFR § 54.312(a)]

- <2012> 2013 Frozen Support Calculation [47 CFR § 54.313(c)(1)]
- <2013> 2014 Frozen Support Calculation [47 CFR § 54.313(c)(2)]
- <2014> 2015 Frozen Support Calculation [47 CFR § 54.313(c)(3)]
- <2015> 2016 and future Frozen Support Calculation [47 CFR § 54.313(c)(4)]

Price Cap Carrier Connect America ICC Support [47 CFR § 54.313(d)]

Certification Support Used to Build Broadband

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Connect America Phase II Reporting [47 CFR § 54.313(e)]

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification
- <2020>

- <2021> Interim Progress Community Anchor Institutions

(3000) Rate Of Return Carrier Additional Documentation

Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	659002
<015>	Study Area Name	PTI PACIFICA INC.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Dr. Frederick R. Hill
<035>	Contact Telephone Number - Number of person identified in data line <030>	6706824556 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	fred.hill@tbbco.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 5 Year Plan
Milestone Certification (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

☐

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))

Name of Attached Document Listing Required Information
(Yes/No)
(Yes/No)

☐

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))
(3014) If yes, does your company file the RUS annual report

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)
(3016)

☐

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information
(Yes/No)

☐

(3018) If the response is no on line 3014, is your company audited?

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

☐

(3020)

☐

(3021)

☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

☐

(3023) Underlying information subjected to a review by an independent certified public accountant

☐

(3024) Underlying information subjected to an officer certification.

☐

(3025)

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation (Continued)

Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	659002
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<020>	Program Year	2016
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<035>	Contact Telephone Number - Number of person identified in data line <030>	6706824556 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	fred.hill@tcbq.net

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	659002
<015> Study Area Name	PTI PACIFICA, INC.
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Dr. Frederick R. Hill
<035> Contact Telephone Number - Number of person identified in data line <030>	6706824556 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	fred.hill@itehq.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: PTI PACIFICA, INC.	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/30/2015
Printed name of Authorized Officer: Rose Soledad	
Title or position of Authorized Officer: Managing Director	
Telephone number of Authorized Officer: 6706822609 ext.	
Study Area Code of Reporting Carrier: 659002	Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	659002
<015> Study Area Name	PTI PACIFICA, INC.
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Dr. Frederick R. Hill
<035> Contact Telephone Number - Number of person identified in data line <030>	6706824556 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	fred.hill@itehq.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

**(800) Operating Companies
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	659002
<015>	Study Area Name	PTI PACIFICA, INC.
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Dr. Frederick R. Hill
<035>	Contact Telephone Number - Number of person identified in data line <030>	6706824556 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	fred.hill@itehq.net
<810>	Reporting Carrier	PTI Pacifica, Inc.
<811>	Holding Company	PTI Pacifica Inc.
<812>	Operating Company	PTI Pacifica, Inc.

[illegible]

IT&E CNMI WIRELESS FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

OVERVIEW

PTI Pacifica, Inc. dba IT&E ("IT&E"), as an Eligible Telecommunications Carrier (ETC) currently provides Universal Service supported services to 5 exchanges, for which there is (are) 4 wire centers.

Consistent with Commission requirements, this Service Quality Improvement Plan addresses only IT&E's non-regulated eligible telecommunications carrier operations.¹ A detailed description of IT&E's plans for the provision of the supported services in the five-year period starting with January 2015 is provided herein.

Per USAC, during the calendar year 2014, IT&E received a total of \$455,420 in USF support funds. The breakdown of the funding for the year was:

- \$0 High Cost Loop Support,
- \$0 Local Switching Support
- \$0 Connect America Fund-Intercarrier Compensation Support
- \$0 Interstate Common Line Support
- \$0 Interstate Access Support
- \$455,420 Fixed High Cost Support

All funds were used in 2014 to both: 1) maintain, upgrade and improve the Company's network and, 2) to cover its operating expenses and debt commitments as necessary to permit it to offer a high level of service for both voice and broadband throughout its service area. IT&E spent a total of _____ to maintain and improve the quality of wireless voice and data service in calendar year 2014. Of this _____ was expended to build and operate broadband capable networks used to offer IT&E's own retail broadband service in areas substantially unserved by an unsubsidized competitor, substantially exceeding the _____ in FHCS required to be spent on building and operating broadband capable networks used to offer IT&E's own retail broadband service in areas substantially unserved by an unsubsidized competitor in accordance with 47CFR54.313(c)(3).

IMPROVEMENT PLANS BY YEAR (2015-2019 inclusive)

Summary descriptions in accordance Part 54.202(a)(1)(ii) and Part 54.313(a)(1) by year and by wire center are presented in the paragraphs below and present network improvements planned for the next five years. Detailed expenditures on a wire center basis are contained in the attached Excel worksheets. Area and population estimates

¹Per 47 C.F.R. § 54.314, federal USF support, "will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended." If investments or expenses are for service areas larger than the supported service areas, then allocations of the expenditures are required.

impacted by the improvements are identified in the worksheets as well as on the wire center maps. Costs are broken out by site and service.

- Network improvement expenditures identify the cost to provide those services supported by the universal service funding mechanisms. When a project involves expenditures for both regulated and non-regulated services, the non-regulated investment costs have been removed. The Company estimates non-regulated costs using the appropriate allocation rules. Details of those costs are retained by the Company and available for inspection.
- Costs for individual projects involving multiple wire centers are broken out by wire center on a ratio of “population served” basis if a specific dollar amount is unavailable.
- Costs are reported only for those service areas in which the Company is authorized to receive USF funding. Costs incurred outside the authorized area, if any, are excluded.
- Costs for improvements made under Mobility Fund Phase 1 Awards T69100950100, T69110000100, T69110001400, T69110001500, T69110001700, T69120950101, and T69120950200 have not been included since these costs are reported separately to via FCC-690s.

Due to the current uncertainty of the amounts of support funds the company may receive in future years, IT&E advises the Commission that the deployment of specific network improvement projects may be modified, and the meeting of projected service goals muted, to accommodate the actual amount of support that will be received.

BASELINE MAPS

IT&E presents the attached Baseline Maps (GIS or similar) highlighting current availability of broadband service, by wire center, which delivers at least 4Mbps actual downstream and 1Mbps actual upstream within its territory which is sufficient to provide VoIP. This is the baseline territory for which network performance testing has occurred for this report.

IT&E is an incumbent local exchange carrier (ILEC) providing telecommunications to the islands of Rota, Tinian, and Saipan in the Commonwealth of the Northern Mariana Islands (CNMI). Established in 1981, it serves a current population of 53,883, over a geographic area of 154.6 sq miles. The service territory is generally hilly with few streams and a limited number of road crossings. The population is concentrated in small villages scattered around the islands. The community is incorporated as a commonwealth. There are a many small family businesses; health, medical, and police facilities are located throughout the community on all three islands. There is a government fire department and both a public school system and many private schools. There are many other anchor institutions located within the serving area. A complete listing can be found on the NTIA ARRA BTOP website.

The demographics of the community reflect its multicultural local and immigrant ethnic roots. The indigenous ethnic population is Chamorro with a sizeable community of Carolinians. There are small, but reasonably sized, ethnic Korean and Chinese communities along with a sizeable Filipino population, all of which use their native languages. IT&E's staff provides customer service in Tagalog, Chinese and Korean languages as needed. Religious affiliations include Roman Catholics, various protestant Christian sects, Muslims, and Buddhists.

There are 20,850 households and a total population of 53,883 within the service territory. The median household income level is approximately \$27,500.00. As a result of the low income, IT&E was serving 43 wireless Lifeline subscribers as of 12/31/2014.



October 15, 2013

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

USAC
Vice President, High Cost and Low Income Division
2000 L Street NW, Suite 200
Washington, DC 20036

Re: PTI Pacifica Inc., d/b/a IT&E Certification Pursuant to 47 C.F.R. § 54.313(a) (5).

Pursuant to the requirements of 47 C.F.R. § 54.313(a)(5) *PTI Pacifica Inc., d/b/a IT&E* hereby certifies to the Federal Communications Commission and the Universal Service Administrative Company that PTI Pacifica Inc. has complied with CTIA's Consumer Code during the reporting period.

I, Steven Carrara, attest for the Study Area Code 659002.

A handwritten signature in black ink, appearing to read "S. Carrara", is written over a horizontal line.

Steven Carrara
General Counsel
Contact No. (671-777-7252)
Steven.Carrara@itehq.net

cc: CNMI PUC



June 11, 2015

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

USAC
Vice President, High Cost and Low Income Division 2000 L Street NW, Suite 200
Washington, DC 20036

Re: PTI Pacifica Inc., d/b/a IT&E Certification Pursuant to 47 C.F.R. § 54.313(a)(5)

Pursuant to the requirements of 47 C.F.R. § 54.313(a)(5) *PTI Pacifica Inc., d/b/a IT&E* hereby certifies to the Federal Communications Commission and the Universal Service Administrative Company that PTI Pacifica Inc. has complied with CTIA's Consumer Code during the reporting period.

I, Steven Carrara, attest for the Study Area Code 659002.

A handwritten signature in black ink, appearing to read "STZ", is written over a horizontal line.

Steven Carrara
General Counsel
Contact No. (671) 777-7252
steven.carrara@itehq.net

Cc: CNMI PUC



June 11, 2015

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC, 20554

USAC
Vice President, High Cost and Low Income Division
2000 L St. NW, Suite 200
Washington, DC, 20036

Re: PTI Pacifica, Inc., d/b/a IT&E Certification Pursuant to 47 C.F.R. § 54.313(a)(6) and set forth in 47 C.F.R. §54.202(a)(2).

Pursuant to the requirements of 47 C.F.R. § 54.313(a)(6) and set forth in 47 C.F.R. §54.202(a)(2) PTI Pacifica, Inc., d/b/a IT&E hereby certifies to the Federal Communications Commission and the Universal Service Administrative Company that it is able to function in emergency situations as described in the attached Business Continuity Plan.

I, Steven Carrara, attest for the Study Area Code 659002.

A handwritten signature in black ink, appearing to read "SLC", is written over a horizontal line.

Steven Carrara
General Counsel
Contact No. (671-777-7252)
steven.carrara@itehq.net

cc: CNMI PUC

IT&E's Lifeline Assistance Program:

The Lifeline Assistance Program gives qualified low-income subscribers a discount on their phone service from the Universal Service Fund. Residential subscribers receiving the following assistance may qualify.

Federal Public Housing Assistance or Section 8

Food Stamps

Medicaid

Low Income Home Energy Assistance Program (LIHEAP)

National School Lunch (NSL) FREE Program

Temporary Assistance to Needy Families (TANF)

Total household income at or below 135% of the Federal Poverty Guidelines(FPG)

The program allows eligible participant to sign-up for:

Basic Lifeline Plan for \$ 16.75 per month

Plan Includes:

300 Free minutes (.20/per additional minute)

Unlimited Local SMS

Free Custom Calling Features

Free LD tolls to the US and selected foreign countries

The standard \$50 deposit is waived if the customer agrees to block long-distance. Toll blocking is free of charge.

Limitations: If a participant wishes to have long-distance, then the \$50 deposit charge is applicable and due upon sign-up. Annual Certification is required to continue eligibility of the Lifeline Assistance Program. Only one Lifeline discount per household.

Call 234-7143 for more details or drop by IT&E's Customer Service Center at Chalan Lau-lau during regular business hours.